To whom it may concern,

My name is Randy Williams. As a long-time user of numerous computer
products and a network engineer by trade, I feel compelled to add my
comments to the thousands you've likely received. I've used Microsoft
products on the x86 platform for many years now, starting with early
versions of their DOS operating system, through the most recent versions
of Windows. I am also an avid user of other "alternative" operating
systems (Linux, *BSD and other Unix varients) and platforms (Sparc, VAX,
Alpha). I've also used numerous associated software products for network
communications, both from Microsoft and other vendors. I feel this lends
my views some credence vis a vis the proposed settlement.

It is my opinion that the settlement is riddled with loopholes that
prevent the bulk of its pro-competitive measures from ever succeeding.
Take for example the concept of "reasonable volume discounts" for OEMs
when purchasing Microsoft products (Section III, part B). Essentially,
this allows Microsoft to continue their practice of bundling their
Office suite, Internet Explorer browser, Media Player et al. for free,
or at steep discounts. This shuts out other vendors of similar products
from even gaining a shot at OEM bundling, giving Microsoft a de facto
monopoly in these areas. This is simply not a penalty. Some vendors that
have been obviously wounded by Microsoft in these venues include Corel
(makers of WordPerfect), Lotus (makers of office productivity software
like 1-2-3 Spreadsheet) and Netscape (makers of the popular web browser).

I also have major concerns regarding section III, part E. As worded,
this provides a massive loophole, permitting Microsoft to gain an unfair
advantage over their competitors in development and use of existing and
future network protocols. Essentially, Microsoft is free to develop
proprietary protocols, and not release them to any 3rd party they feel
is not using their specifications for direct interoperation with a
Windows-based client or server. It also does not make these
specifications freely, or inexpensively, available, allowing Microsoft
to charge exorbitant fees, preventing all but the largest corporations
to gain access to the specifications. Inevitably, battles will be fought
between Microsoft and 3rd party developers over licensing of these
protocols, but for every day that the specs are hidden, Microsoft gains
 a stronger foothold in network operating systems and their management.

In other words, time is money, and by not specifically stipulating that
any and all developers can gain access to these protocol specifications
for a reasonable, agreed-upon set fee is to Microsoft's distinct
advantage. This also quietly allows Microsoft to retain proprietary

specifications on document formatting (DOC, XLS, PPT) and audio/video formats (WMV, WMA, ASF). It is these specifications that run the "killer apps" that run on their monopoly operating system. Forcing Microsoft to open these protocols would allow competitors some ability to compete on a level playing field.

As a network engineer, the concepts of open standards are near and dear to me. Protocols that have been openly shared amongst developers gave us the ability to found the Internet as we know it. Free, open software that runs these open protocols has run the Internet (BIND for name resolution, Apache for web serving, Sendmail for email services). If Microsoft is able to continue to grow their hold on network protocols by leveraging their operating system monopoly, I fear it will damage the global Internet irreparably.

I ask that you join the nine states that have disagreed with this settlement proposol, and demand much stronger remedies, both in conduct and financial penalties. Only then will Microsoft feel any pain from their anti-competitive, illegal activties. I thank you for your time.

Regards,
Randy Williams
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